

1     Joel E. Tasca  
2     Nevada Bar No. 14124  
3     Joseph Dagher  
4     Nevada Bar No. 15204  
5     BALLARD SPAHR LLP  
6     1980 Festival Plaza Drive, Suite 900  
7     Las Vegas, Nevada 89135  
8     Telephone: (702) 471-7000  
9     Facsimile: (702) 471-7070  
10    E-mail: tasca@ballardspahr.com  
11    E-mail: dagherj@ballardspahr.com

7 Attorneys for Defendants Café De  
8 Manila, LLC; Millie Cadag and Homer  
Tuazon

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

**JOE HAND PROMOTIONS, INC., a  
Pennsylvania corporation.**

**Plaintiff,**

V.

CAFÉ DE MANILA, LLC, a Nevada limited liability company d/b/a CAFÉ DE MANILA; MILLIE CADAG, an individual; and HOMER TUAZON, an individual,

### Defendants.

CASE NO. 2:22-cv-001086-CDS-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

## (Second Request)

20 Defendants' response to Plaintiff Joe Hand Promotions, Inc.'s ("Plaintiff")  
21 complaint is due on November 28, 2022. Defendants and Plaintiff agree that  
22 Defendants have up to and including December 5, 2022, to respond to Plaintiff's  
23 complaint. The parties are close to reaching a settlement in this matter and will  
24 need time to finalize the settlement terms.

25 | / / /

26 | / / /

27 | //

1        This is the second request for an extension, and it is made in good faith and  
2 not for purposes of delay.

3        DATED this 28<sup>th</sup> day of November, 2022.

4 BALLARD SPAHR LLP

5 GILE LAW GROUP

6 By: /s/ Joseph Dagher

7 Joel E. Tasca  
Nevada Bar No. 14124  
Joseph Dagher  
Nevada Bar No. 15204  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135

8  
9 *Attorneys for Defendants*

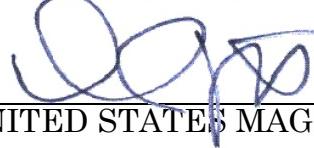
By: /s/ Ryan Gile

Ryan Gile  
Nevada Bar No. 8807  
1180 N. Town Center Drive, Suite 100  
Las Vegas, Nevada 89144  
(702) 703-7288  
rg@gilelawgroup.com

10  
11 *Attorneys for Plaintiff*

12  
13  
14 **ORDER**

15 IT IS SO ORDERED:



16  
17 UNITED STATES MAGISTRATE JUDGE

18  
19 DATED: 11/29/2022

20  
21  
22  
23  
24  
25  
26  
27  
28  
BALLARD SPAHR LLP  
1980 FESTIVAL PLAZA DRIVE, SUITE 900  
LAS VEGAS, NEVADA 89135  
(702) 471-7000 FAX (702) 471-7070